

EXHIBIT F

From: [Bret Stanley](#)
To: [Angela Angotti](#); [Brianna Leo](#); [Abigail Carrier](#); [Sierra Flores](#); [Erica Suarez](#); [Larry J. Goldman](#); [Eric Ramos](#); [Ronald Ramos](#); [Sandra Robouin](#); [Nicole Bechet](#); [Jack Shea](#); [Randy Jeffries](#); [Jherrera@herrerlaw.com](#); [Jamie Giron](#); [Lydia Tsao](#); [Estefy Mitre](#)
Cc: [Eva DeLeon](#); [Cade Connors](#); [Amanda Salvador](#); [Clerk](#); [Ida Montalvo](#); [Sara Margo](#); [David Plaut](#); [Irene Silva](#); [Lisa Chapa](#); [Erika Coignet](#); [Chelsea Ramos](#); [Christina Vansickle](#); [Gromada, Veronica G. \(SHB\)](#); [Chris Cox](#); [Priest Johnson, Kimberly \(SHB\)](#); [Shortnacy, Michael \(SHB\)](#); [Jorge Herrera](#)
Subject: Smith v. Trevino et al - MDL Protective Order Notice
Date: Wednesday, August 20, 2025 9:48:00 AM
Attachments: [2025.08.18 Order RE Uber's Motion to Enforce Protective Order \(FS\).pdf](#)

Ms. Angotti and Opposing Counsel in *Smith* Matter –

Included on this email are MDL Leadership Counsel for Uber, Ms. Gromada, Mr. Cox, Ms. Priest Johnson, and Mr. Shortnacy. Attached is the Order that was entered on Uber's Motion to Enforce Protective Order in MDL 3084. Please review this Order and comply with the instructions therein and below.

Uber MDL Counsel, included on this email are the individuals that have received the Knowledge Base List that was attached to Plaintiff's 5th Request for Production. Plaintiffs have not filed a motion to compel on this matter yet and have filed Exhibit A to the RFPs publicly. Below is a list of firms that have received the information ruled by Judge Cisneros as confidential:

Plaintiff's Counsel and Staff –

- Ramos Law Firm
 - Eric Ramos
 - Ronald Ramos
 - Sandra Robouin
 - Ronald Ramos
 - Randy Jeffries
 - Irene Montalvo
 - Amanda Salvador
 - Irene Silva
 - Chelsea Ramos
- Herrera Law Firm
 - Jorge Herrera

Defense Counsel and Staff–

- Bowman and Brook
 - Angela Angotti
 - Nicole Bechet

- Jack Shea
- Jamie Giron
- Lydia Tsao
- Estefy Mitre
- Brianna Leo
- Sara Margo
- Dorsett Johnson
 - Abigail Carrier
 - Cade Connors
- Hanna Plaut
 - Eva DeLeon
 - David Plaut
 - Sierra Flores
- Goldman Peterson
 - Larry Goldman
 - Erica Suarez
 - Erica Coignet
 - Christina VanSickle
 - Lisa Chapa

Smith Plaintiff and Defense Counsel– Per the Court Order, you should take efforts to destroy Exhibit A to Plaintiff’s 5th Request for Production.

Smith Opposing Counsel – You should be aware that Uber MDL Counsel **only** challenged the confidential nature of 19 (nineteen) of the named Knowledge Based Articles on Plaintiff’s Exhibit A to the 5th Request for Production. To be clear, the full list of Exhibit A to Plaintiff’s requests were not challenged, only 19 of the 180 documents requested. These 19 Resources were identified to me by Uber MDL Counsel yesterday and I am in the process of verifying the 19 Named Policies by Uber MDL Counsel are subject to the Order. Once verified, I will submit to you the amended Exhibit A list to Plaintiff’s 5th Request for Production and will only seek for production the items not found to be a breach of the Protective Order by the MDL Court. None of the other substantive requests to Plaintiff’s Fifth Request for Production were subject to the MDL Counsel’s Motion to Enforce Protective Order.

A Notice to the Court attaching the Order will be filed in the *Smith* Matter in accordance with the attached MDL Order.

Sincerely,

Bret Stanley

EXHIBIT G

From: [Bret Stanley](#)
To: [Gonzales, Judge Norma](#); [Angela Angotti](#); [Jack Shea](#); [Valencia, Jennifer](#); [Eric Ramos](#); [Randy Jeffries](#); [Jherrerera@herreralaw.com](#)
Cc: [Brianna Leo](#); [Eva DeLeon](#); [Abigail Carrier](#); [Sandra Robouin](#); [Erica Suarez](#); [Sierra Flores](#); [Valencia, Jennifer](#); [Cade Connors](#); [Amanda Salvador](#); [Clerk](#); [Ida Montalvo](#); [Michael Aguilar](#); [Jessica Putonti](#); [Larry J. Goldman](#); [Nicole Bechet](#); [Paige Cheung](#); [Ronald Ramos](#); [Sara Margo](#); [Tori Olson](#); [Jamie Giron](#); [David Plaut](#); [Irene Silva](#); [Lisa Chapa](#); [Erika Coignet](#); [Chelsea Ramos](#)
Subject: 2022CI11011 - Smith v. Carla Reyes Trevino, Joshua Aldana, Ruben Maldonado Jr., Albert Angel Reyes Trevino, Uber Technologies, Inc., Portier LLC, and Raiser, LLC.
Date: Thursday, August 21, 2025 9:07:00 AM
Attachments: [image001.png](#)
[2025.08.18 Order RE Uber's Motion to Enforce Protective Order \(FS\).pdf](#)

Judge Gonzales –

Per the attached Court Order in MDL 3084, I am required to provide this Order to you.

Counsel for Uber brought a Motion to Enforce the Protective Order in *In Re: Uber Technologies Inc., Passenger Sexual Assault Litigation*, MDL 3084. The Motion to Enforce MDL 3084's Protective Order was based in part on discovery requests made in the *Smith* matter before your Court. In Plaintiff's Fifth Request for Production to the Uber Defendants in *Smith*, I submitted a list of 180 documents identified by name in an attachment to the discovery request. The MDL Court found that 19 of the 180 named documents on the list I provided in the *Smith* matter amounted to a breach of the MDL's Protective Order based on a finding by the MDL Court that the name of the document is protected. I am amending the list provided in Plaintiff's Fifth Request for Production to remove those named documents that were considered a breach by the MDL Court.

It is likely that we will be before you soon on these Plaintiff's Fifth Request for Production, assuming conferrals concerning response and production of documents associated with these requests are not fruitful.

If the Court desires a status conference to discuss these matters, Plaintiff's Counsel will make themselves available.

Sincerely,

Bret Stanley
 Johnson Law Group
 Counsel for Ivan Smith

From: Gonzales, Judge Norma <norma.gonzales@bexar.org>
Sent: Friday, April 25, 2025 8:38 AM
To: [Angela Angotti](mailto:Angela.Angotti@bowmanandbrooke.com) <Angela.Angotti@bowmanandbrooke.com>; [Jack Shea](mailto:Jack.Shea@bowmanandbrooke.com) <Jack.Shea@bowmanandbrooke.com>; Valencia, Jennifer <Jennifer.Valencia@bexar.org>; [Eric Ramos](mailto:Eric.Ramos@ericramoslaw.com) <eric@ericramoslaw.com>; [Randy Jeffries](mailto:Randy.Jeffries@ericramoslaw.com) <rjeffries@ericramoslaw.com>; [Bret Stanley](mailto:Bret.Stanley@johnsonlawgroup.com) <bstanley@johnsonlawgroup.com>; Jherrerera@herreralaw.com
Cc: [Brianna Leo](mailto:Brianna.Leo@bowmanandbrooke.com) <Brianna.Leo@bowmanandbrooke.com>; [Eva DeLeon](mailto:Eva.DeLeon@hannaplaut.com) <edeleon@hannaplaut.com>; [Abigail Carrier](mailto:Abigail.Carrier@dorsettjohnson.com) <acarrier@dorsettjohnson.com>; [Sandra Robouin](mailto:Sandra.Robouin@RonRamos.com) <SRobouin@RonRamos.com>; [Erica Suarez](mailto:Erica.Suarez@ljlglaw.com) <erica@ljlglaw.com>; [Sierra Flores](mailto:Sierra.Flores@hannaplaut.com) <sflores@hannaplaut.com>; Valencia, Jennifer <Jennifer.Valencia@bexar.org>; [Cade Connors](mailto:Cade.Connors@dorsettjohnson.com) <CConnors@dorsettjohnson.com>; [Amanda Salvador](mailto:Amanda.Salvador@ericramoslaw.com) <amanda@ericramoslaw.com>; [Clerk](mailto:Clerk@ronramos.com) <Clerk@ronramos.com>; [Ida Montalvo](mailto:Ida.Montalvo@RonRamos.com) <Ida@RonRamos.com>; [Michael Aguilar](mailto:Michael.Aguilar@ljlglaw.com) <Michael@ljlglaw.com>; [Jessica Putonti](mailto:Jessica.Putonti@dorsettjohnson.com) <jputonti@dorsettjohnson.com>; [Larry J. Goldman](mailto:Larry.J.Goldman@ljlglaw.com) <Larry@ljlglaw.com>; [Nicole Bechet](mailto:Nicole.Bechet@bowmanandbrooke.com) <Nicole.Bechet@bowmanandbrooke.com>; [Paige Cheung](mailto:Paige.Cheung@bowmanandbrooke.com) <Paige.Cheung@bowmanandbrooke.com>; [Ronald Ramos](mailto:Ronald.Ramos@ronramospc@yahoo.com) <ronramospc@yahoo.com>; [Sara Margo](mailto:Sara.Margo@bowmanandbrooke.com) <Sara.Margo@bowmanandbrooke.com>; [Tori Olson](mailto:Tori.Olson@dorsettjohnson.com) <tolson@dorsettjohnson.com>; [Jamie Giron](mailto:Jamie.Giron@bowmanandbrooke.com) <Jamie.Giron@bowmanandbrooke.com>; [David Plaut](mailto:David.Plaut@hannaplaut.com) <dplaut@hannaplaut.com>; [Irene Silva](mailto:Irene.Silva@ronramos.com) <Irene@ronramos.com>; [Lisa Chapa](mailto:Lisa.Chapa@ljlglaw.com) <LisaC@ljlglaw.com>; [Erika Coignet](mailto:Erika.Coignet@ljlglaw.com) <Erika@ljlglaw.com>; [Chelsea Ramos](mailto:Chelsea.Ramos@ericramoslaw.com) <chelsea@ericramoslaw.com>
Subject: RE: 2022CI11011 - Smith v. Carla Reyes Trevino, Joshua Aldana, Ruben Maldonado Jr., Albert Angel Reyes Trevino, Uber Technologies, Inc., Portier LLC, and Raiser, LLC.

[EXTERNAL]

Please circulate order and approve as to form.

Norma Gonzales
 Judge, 131st District Court

From: [Angela Angotti](mailto:Angela.Angotti@bowmanandbrooke.com) <Angela.Angotti@bowmanandbrooke.com>
Sent: Thursday, April 24, 2025 5:19 PM
To: [Jack Shea](mailto:Jack.Shea@bowmanandbrooke.com) <Jack.Shea@bowmanandbrooke.com>; Gonzales, Judge Norma <norma.gonzales@bexar.org>; Valencia, Jennifer <Jennifer.Valencia@bexar.org>; [Eric Ramos](mailto:Eric.Ramos@ericramoslaw.com) <eric@ericramoslaw.com>; [Randy Jeffries](mailto:Randy.Jeffries@ericramoslaw.com) <rjeffries@ericramoslaw.com>; bstanley@johnsonlawgroup.com; Jherrerera@herreralaw.com
Cc: [Brianna Leo](mailto:Brianna.Leo@bowmanandbrooke.com) <Brianna.Leo@bowmanandbrooke.com>; [Eva DeLeon](mailto:Eva.DeLeon@hannaplaut.com) <edeleon@hannaplaut.com>; [Abigail Carrier](mailto:Abigail.Carrier@dorsettjohnson.com) <acarrier@dorsettjohnson.com>; [Sandra Robouin](mailto:Sandra.Robouin@RonRamos.com) <SRobouin@RonRamos.com>; [Erica Suarez](mailto:Erica.Suarez@ljlglaw.com) <erica@ljlglaw.com>; [Sierra Flores](mailto:Sierra.Flores@hannaplaut.com) <sflores@hannaplaut.com>; Valencia, Jennifer <Jennifer.Valencia@bexar.org>; [Cade Connors](mailto:Cade.Connors@dorsettjohnson.com) <CConnors@dorsettjohnson.com>; [Amanda Salvador](mailto:Amanda.Salvador@ericramoslaw.com) <amanda@ericramoslaw.com>; [Clerk](mailto:Clerk@ronramos.com) <Clerk@ronramos.com>; [Ida Montalvo](mailto:Ida.Montalvo@RonRamos.com) <Ida@RonRamos.com>; [Michael Aguilar](mailto:Michael.Aguilar@ljlglaw.com) <Michael@ljlglaw.com>; [Jessica Putonti](mailto:Jessica.Putonti@dorsettjohnson.com) <jputonti@dorsettjohnson.com>; [Larry J. Goldman](mailto:Larry.J.Goldman@ljlglaw.com) <Larry@ljlglaw.com>; [Nicole Bechet](mailto:Nicole.Bechet@bowmanandbrooke.com) <Nicole.Bechet@bowmanandbrooke.com>; [Paige Cheung](mailto:Paige.Cheung@bowmanandbrooke.com) <Paige.Cheung@bowmanandbrooke.com>; [Ronald Ramos](mailto:Ronald.Ramos@ronramospc@yahoo.com) <ronramospc@yahoo.com>; [Sara Margo](mailto:Sara.Margo@bowmanandbrooke.com) <Sara.Margo@bowmanandbrooke.com>; [Tori Olson](mailto:Tori.Olson@dorsettjohnson.com) <tolson@dorsettjohnson.com>; [Jamie Giron](mailto:Jamie.Giron@bowmanandbrooke.com) <Jamie.Giron@bowmanandbrooke.com>; [David Plaut](mailto:David.Plaut@hannaplaut.com) <dplaut@hannaplaut.com>; [Irene Silva](mailto:Irene.Silva@ronramos.com) <Irene@ronramos.com>; [Lisa Chapa](mailto:Lisa.Chapa@ljlglaw.com) <LisaC@ljlglaw.com>; [Erika Coignet](mailto:Erika.Coignet@ljlglaw.com) <Erika@ljlglaw.com>; [Chelsea Ramos](mailto:Chelsea.Ramos@ericramoslaw.com) <chelsea@ericramoslaw.com>
Subject: RE: 2022CI11011 - Smith v. Carla Reyes Trevino, Joshua Aldana, Ruben Maldonado Jr., Albert Angel Reyes Trevino, Uber Technologies, Inc., Portier LLC, and Raiser, LLC.

EXHIBIT H



Bruce Stern 8/12/2025 - 3:55 PM  

Lord v. Uber

From: Bruce H. Stern bstern@stark-stark.com

To: John W. Meyer john.meyer@bowmanandbrooke.com

Cc: Chris Carton chris.carton@bowmanandbrooke.com, Edward O'Toole

edward.otoole@bowmanandbrooke.com, chayalordz167087@stark-stark.filevineapp.com

Date: Tue Aug 12 2025 07:55:06 GMT+00:00

I won't be able to get in touch with you today.

However based on the Magistrate's decision today in the MDL, please send me a consent order to take down exhibit A.

Also we will want to depose O'Keefe, not as the corporate rep but for the limited purpose of questioning her regarding her signed certification. We also will need two days to depose Uber's corporate rep, whether that individual is O'Keefe or someone else. However, we cannot begin depositions of the corporate rep or Uber's other employees until we get all the documents we have requested.

Also I want all of O'Keefe's 95 depositions.

I will get back to you with a clarification regarding O'Keefe's certification and why we believe Uber has not complied.

Also Uber is required to provide a certification affirming or not Chris' representation that all the KB policies we requested were related to sexual assault.

Finally we will be forwarding a new list of KB policies that are not original to the MDL.

Bruce H. Stern, Esq.
Shareholder

EXHIBIT H

EXHIBIT I

Christopher R. Carton, Esq.
New Jersey Bar No. (016691995)
John W. Meyer, Esq.
New Jersey Bar No. (334332021)
BOWMAN AND BROOKE LLP
317 George Street, Suite 320
New Brunswick, NJ 08901
john.meyer@bowmanandbrooke.com
chris.carton@bowmanandbrooke.com
Tel.: (201) 577-5196
Fax: (804) 649-1762
Attorneys for Defendants
Uber Technologies, Inc. and Rasier LLC

CHAYA LORD and BRANDON LORD,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC, RASIER,
LLC, JUAN R. ESCOBAR, JOHN DOES 1-
10 (fictitious designations), and ABC
COMPANIES 1-10 (fictitious designations),

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - MERCER COUNTY

DOCKET NO. MER-L-360-24

CONSENT ORDER

THIS MATTER having been opened to the Court by Bowman and Brooke LLP, attorneys for Defendants Uber Technologies, Inc., Rasier, LLC, and attorneys for Plaintiffs Chaya Lord and Brandon Lord, having indicated their consent to the entry of the within Order by signing below, and the Court having considered the matter, and good cause having been shown;

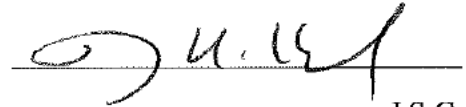
IT IS on this 13th day of August, 2025

ORDERED that portions of the Plaintiffs' Motion to Compel (LCV20251781133) filed by Plaintiffs on June 17, 2025, be deleted as follows:

1. Exhibit A: Plaintiffs' 12th Notice to Produce

IT IS FURTHER ORDERED that a copy of this Order shall be deemed served upon all

parties upon its filing with eCourts.


J.S.C.

We hereby consent to the form and entry of the foregoing Consent Order.

DATED: August _12_, 2025

STARK & STARK

By: /s/ Bruce H. Stern
BRUCE H. STERN
Attorney for Plaintiffs, CHAYA LORD and
BRANDON LORD

DATED: August 12, 2025

BOWMAN AND BROOKE LLP

By: s/John W. Meyer
JOHN W. MEYER
Attorneys for Defendants, UBER TECHNOLOGIES,
INC.; and RASIER, LLC

EXHIBIT J

From: [Bret Stanley](#)
To: ["Edward O'Toole"; "Chris Carton"](#)
Cc: ["Matthew P. Kessler"; "Shiomara A. Frias"; "Patricia Coslove"; "Beatrice McCleese"; "John W. Meyer"; "Bruce H. Stern"; Gromada, Veronica G. \(SHB\); Chris Cox; Priest Johnson, Kimberly \(SHB\); Shortnacy, Michael \(SHB\)](#)
Subject: Lord v. Uber MER-L-360-24 - MDL Protective Order Notice
Date: Wednesday, August 20, 2025 11:48:00 AM
Attachments: [2025.08.18 Order RE Uber's Motion to Enforce Protective Order \(FS\).pdf](#)
[CivilCaseJacket - 2025-08-20T113714.326.pdf](#)

Mr. O'Toole and Opposing Counsel in the *Lord* Matter –

Included on this email are MDL Leadership Counsel for Uber, Ms. Gromada, Mr. Cox, Ms. Priest Johnson, and Mr. Shortnacy. Attached is the Order that was entered on Uber's Motion to Enforce Protective Order in MDL 3084. Please review this Order and comply with the instructions therein and below.

Uber MDL Counsel, included on this email are the individuals that have received the Knowledge Base List that was attached to Plaintiff's 12th Supplemental Notice to Produce ("12th NTP"). As you are aware, a Motion to Compel was filed on this matter and the 12th NTP with Exhibit A was attached to the motion in a public filing. On August 13, 2025, the Court in the *Lord* Matter entered an Order deleting the Exhibit A to Plaintiff's 12th NTP from the docket. (See attached Order.) This document should no longer be available on the public docket.

In the *Lord* Matter the below firms and attorney received Plaintiff's 12th NTP:

- Plaintiff's Counsel and Staff
 - Stark & Stark
 - Bruce Stern
 - Patricia Coslove
 - Evan Lide
- Defense Counsel and Staff
 - Bowman Brooke
 - Edward O'Toole
 - Chris Carton
 - Beatrice McCleese
 - John Meyer
 - Zarwin
 - Matthew Kessler
 - Shiomara Frias

Lord Plaintiff and Defense Counsel - Per the Court Order, you should take efforts to destroy the previously received version of Exhibit A to Plaintiff's 12 NTP.

Opposing Counsel in *Lord* – The MDL Court entered an Order that found Plaintiff’s identification of 587 of the ~870 identified Knowledge Based Documents amounted to a breach of the MDL’s Protective Order. Roughly 1/3 of the identified Knowledge Base Documents were not found to be breach of the MDL Protective Order. None of the other substantive requests in Plaintiff’s 12th NTP were found to be breaches of the MDL’s Protective Order. We will be reworking an amended Exhibit to Plaintiff’s 12th NTP that does not include protected material to comply with the MDL’s attached order.

A Notice to the Court of the attached Order will be emailed to the Court in accordance with the attached MDL Order.

Sincerely,

Bret Stanley